## Exhibit 1

Proposed Form of Order

## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

) Chapter 9
) Case No. 13-53846
) Hon. Steven W. Rhodes

## ORDER (I) CLARIFYING THE COURT'S JULY 22, 2013 ORDER AND (II) GRANTING LEAVE TO SYNCORA GUARANTEE INC., AND SYNCORA CAPITAL ASSURANCE TO CONDUCT LIMITED DISCOVERY

This matter coming before the Court on the motion<sup>1</sup> of Syncora Guarantee Inc., and Syncora Capital Assurance Inc. (collectively, "Syncora") for the entry of an order (i) clarifying the Court's July 22, 2013 Ex Parte Order (A) Scheduling Expedited Hearings on Certain Initial Motions Filed by the Debtor, (B) Scheduling an Initial Status Conference, (C) Limiting Notice of Hearing, and (D) Approving Form and Manner of Notice [Docket No. 65] (the "July 22 Order"); and (b) leave to conduct limited discovery relating to Motion of Debtor for Entry of an Order (I) Authorizing the Assumption of that Certain Forbearance and Optional Termination Agreement Pursuant to Section 365(a) of the Bankruptcy Code, (II) Approving Such Agreement Pursuant [to] Rule 9019, and (III) Granting Related Relief [Docket No. 17] (the "Assumption Motion"); the Court having reviewed Syncora's Motion; and the Court having determined that the legal and factual bases set forth in the motion establish just cause for the relief granted herein;

## IT IS HEREBY ORDERED THAT:

1. Syncora's motion is GRANTED.

13-53846-tjt Doc 142-1 Filed 07/24/13 Entered 07/24/13 00:24:59 Page 2 of 3

<sup>&</sup>lt;sup>1</sup> Capitalized terms not otherwise defined herein have the meanings given to them in Syncora's motion.

- 2. The hearing regarding the Assumption Motion set for August 2, 2013 shall be an initial status conference to set a briefing and discovery schedule relating to the Assumption Motion.
- 3. Good cause exists for Syncora to conduct limited discovery relating to the Assumption Motion. Syncora may now commence discovery.
- 4. Syncora is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the motion.
- 5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.
- 6. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.